

REMARKS

Reconsideration and allowance of this application are respectfully requested in view of the above amendments. Applicants thank the Examiner and his supervisor for courtesies extended during the personal interview of March 8, 2004.

Aside from discussing the references as they relate to independent claim 15, certain proposals were set forth as reflected by the above amendment in an effort to more clearly define the subject matter of the present invention.

Claims 15 and 18 have been rejected under 35 USC §102 as anticipated by Yukutake (WO 9844687) as detailed as item A on page 3. Claim 15 is also rejected under 35 USC §102(e) as anticipated by Nemoto et al. U.S. Patent No. 6,407,432 as detailed on page 4. Claim 16 is rejected over the combination of Nemoto and Miura U.S. Patent No. 4,993,396 under 35 USC §103 while claim 17 is rejected over the combination of Nemoto and Foerster U.S. Patent No. 5,828,141.

As indicated in the previously filed Amendment of September 30, 2004, Applicants submitted that claim 15 defines over the art of record. Based on the above mentioned personal interview, it is now understood that claim 15 is interpreted as being met by Nemoto because of "a plurality of power semiconductor elements 67-68-69." As pointed out during the interview, the term "power semiconductor element" has a meaning in the art and the circuit regions 67-69 of Nemoto are not "power semiconductor elements". Additionally, according to the Examiner, the circuit regions 67-69 were indicated as being individually isolated from each because any one element of region 67, for example, would be isolated from any one element of region 68. Additionally it was indicated that the area surrounding each one of the circuit regions are isolated from each other by a trench which is seen as the three regions surrounding each of the regions 67-69.

Additionally, there was an insulation layer 10 in cross-section view of Fig. 2 and there were three isolators 4.

Aside from the failure of the reference power semiconductor element, Applicants submit that each of the circuit 67-69 have a plurality of “elements”, it is quite certain that these plurality of power semiconductor elements are not “each connected to at least two different device terminals as is claimed”. That is if it is supposed that circuit 67 has five elements and one of those elements is seen as “isolated from” one of five elements of circuit 68 in order to meet the requirement of “a plurality of power semiconductor elements” it is also equally certain that those two elements are not each connected to at least two different device terminals in order to provide connectability to said semiconductor device as is required by independent claim 15.

The same arguments apply with respect to the failure of the reference to Yukutake '687 concerning a lack of “power semiconductor elements” and a lack of two of those elements being each connected to at least two different device terminals in order to provide connectability to said semiconductor device.

The dependent claims 16-18 contain all the limitations of independent claim 15 and, even accepting the statement of the Examiner for these secondary references, they fail to meet the limitations of independent claim 1 and are not certainly not obvious combinations to one of ordinary skill in the art.

In spite of what Applicants feel are distinguishing features from the claimed invention, Applicants are proposing to recite a plurality of power semiconductor transistors and that two of the plurality of power transistors are each connected to each other in series and to further indicate that the plurality of semiconductor transistors are individually isolated from each other and isolated from any other semiconductor transistors.

Therefore Applicants submit that the application, prior to the above Amendment, defines over the art of record and that the above Amendment will further clarify the claimed relationships in a manner which specifically defines the invention consistent with the disclosure.

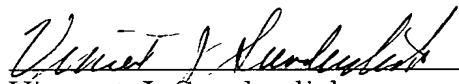
Therefore Applicants respectfully request the allowance of this application.

If there are any questions regarding this amendment or the application in general, a telephone call to the undersigned would be appreciated since this should expedite the prosecution of the application for all concerned.

If necessary to effect a timely response, this paper should be considered as a petition for an Extension of Time sufficient to effect a timely response, and please charge any deficiency in fees or credit any overpayments to Deposit Account No. 05-1323 (Docket #056207.50307C1).

Respectfully submitted,

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